

SUMMARY OF VIOLATIONS

On May 22-24, May 30, and June 4, 2002, Department of Toxic Substances Control (DTSC), California Environmental Protection Agency, conducted an inspection at:

Facility Name: Lawrence Livermore National Laboratory (LLNL)

Facility Address: 7000 East Avenue, Livermore, California 94550

EPA ID Number: CA2 890 012 584

County Name: Alameda County

As a result of that inspection, the violations of hazardous waste laws, regulations, and requirements listed on the attached pages were discovered. All violations must be corrected; the actions you must take to correct the violations are listed with each violation. If you disagree with any of the violations or proposed corrective actions listed in this Summary of Violations, you should inform DTSC.

DTSC will provide you a complete inspection report within 65 days of the date of this inspection. You may request a meeting with DTSC to discuss the inspection or the findings of the report. The issuance of this Summary of Violations does not preclude DTSC from taking administrative, civil, or criminal action as a result of the violations noted in the Summary of Violations.

Authorized Company Representative

Name STEPHANIE S. GOODWIN

Title Deputy Div. Ldr HWY

Signature Stephanie S. Goodwin

Date June 6, 2002

Authorized State Agent

Name Luz T. Castillo

Title Senior Hazardous Substances Scientist

Signature Luz T. Castillo

Date JUNE 6, 2002

SUMMARY OF VIOLATIONS

Facility Name: Lawrence Livermore National Laboratory **Date:** June 6, 2002

VIOLATIONS

Storage of Hazardous Wastes in an Unpermitted Area

- 1 LLNL violated Health and Safety Code, section 25202 (a), California Code of Regulations, title 22, section 66270.30 (a) and Hazardous Waste Facility (HWFP), Parts III.2. (b), and IV.2 in that, on or about May 22, 2002, a 55-gallon container of mixed waste, Q00067475, containing spent organic lab trash, with a workplace end date of December 1, 2001, was being stored in Area 612-4, an unpermitted storage area.

Area 612-4 Receiving, Segregation, and Container Storage Unit was converted to a 90-day generator accumulation unit on December 4, 1999.

Compliance Action

No further action is required regarding the above violation. Based on the Container Contents Report provided to DTSC representatives on June 4, 2002, the above drum was transferred to Building 625 Container Storage Unit, a permitted storage area, on May 29, 2002.

Storage of Hazardous Wastes Greater than One Year

- 2 LLNL violated Health and Safety Code, section 25202 (a), California Code of Regulations, title 22, section 66270.30 (a) and Hazardous Waste Facility (HWFP), Parts III.2. (b), and IV. 10.(a) in that, on or about May 23, 2002, two containers of hazardous wastes were being stored for greater than one year in Building 693-1008, Container Storage Unit, to wit:
 - a. Container Q00060399, a 55-gallon drum containing spent inorganic liquid, trimsol 10%, labeled with a permitted storage unit (TSDF) acceptance date of February 8, 2001;
 - b. Container Q00060291, a 55-gallon drum containing spent inorganic liquid mop water, labeled with a TSDF acceptance date of March 15, 2001.

LLNL is authorized to store hazardous waste in the permitted storage units up to a maximum of one year from the date of first acceptance at any of the hazardous waste management units.

Compliance Action

Effective immediately, LLNL shall arrange for the off-site shipment of the above containers. Within

Summary of Violations

15 days of receipt of this Summary of Violations, LLNL shall submit to DTSC, a copy of the manifest(s) used to accompany the shipment of the hazardous waste containers to a permitted facility.

Failure to Maintain Adequate Aisle Space, Area 514-3

- 3 LLNL violated California Code of Regulations, title 22, section 66265.35 in that, on or about May 23, 2002, LLNL failed to maintain aisle space between the portable tanks containing mixed wastes, in Area 514-3 Container Storage Unit, to allow the unobstructed movement of personnel, fire protection equipment, spill control equipment, and decontamination equipment in an emergency.

Compliance Action

Effective immediately, LLNL shall maintain the required aisle space in the storage area to allow easy access and response to containers and/or portable tanks in an emergency such as plugging a leak, removing spilled materials/wastes using adsorbents or portable pumps, or removing a container or portable tank.

RECORDS FOR REVIEW

As part of the inspection, records related to hazardous waste management have been requested and obtained from LLNL for review. Records include but not limited to the following: waste analysis; amount of waste stored in the permitted areas; manifests; waste tracking/inventory; treatment records; annual report; specific container information; personnel training; and inspection logs.

DTSC's findings from the review of the above documents will be incorporated in the inspection report.